

## **By Electronic Filing**

April 15, 2014

Marlene Dortch Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington DC 20544

Re:

A National Broadband Plan for Our Future, GN Docket No. 09-51; Petition of tw telecom inc. et al. to Establish Regulatory Parity in the Provision of Non-TDM-Based Broadband Transmission Services, WC Docket No. 11-188; Business Broadband Marketplace, WC Docket No. 10-188; Framework for Broadband Internet Service, GN Docket No. 10-127; Cbeyond, Inc. Petition for Expedited Rulemaking to Require Unbundling of Hybrid, FTTH, and FTTC Loops Pursuant to 47 U.S.C. § 251(c)(3) of the Act, WC Docket No. 09-223; Petition for Expedited Rulemaking to Adopt Rules Pertaining to the Provision by Regional Bell Operating Companies of Certain Network Elements Pursuant to 47 U.S.C. § 271(c)(2)(B) of the Act, WC Docket No. 09-222; Policies and Rules Governing Retirement Of Copper Loops by Incumbent Local Exchange Carriers, RM-11358 & Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25

## Dear Ms. Dortch:

On Friday, April 11, 2014, Robert T. Hale, President and Chief Executive Officer of Granite Telecommunications, LLC ("Granite"), Samuel J. Kline, Senior Vice President, Strategic Initiatives, Kevin Joseph of The Joseph Group, LLC and I met with Tom Wheeler, Chairman, Jon Sallet, General Counsel and Daniel Alvarez, the Chairman's Wireline Legal Advisor, in connection with the above referenced matters.

Granite discussed how it provides voice and data services for multisite businesses and governmental entities, and how those services could be impacted by changes occurring within the marketplace, including changes in technology. Granite explained that it has traditionally offered voice and data solutions to its customers, which include over two thirds of the Fortune 100, through commercially-negotiated UNEP replacement product contracts with major incumbent local exchange carriers. More recently, Granite has expanded the number of underlying service providers it utilizes and offered voice and data services on Granite's own facilities-based voice and data MPLS and VoIP networks solutions,

Marlene Dortch April 15, 2014 Page 2 of 2

though ILEC network platforms continue to provide the network infrastructure for the overwhelming majority of Granite's customers.

Granite noted that it is presently negotiating extensions of underlying ILEC agreements, and that ILEC efforts to limit the duration of extensions could diminish Granite's ability to offer its customers contracts of sufficient lengths of time, thus making Granite less competitive in the marketplace that it serves. To promote competition, Granite advocated for contracts of similar durations to those in the past (or longer) and to apply regardless of the underlying network technologies employed.

Under Section 1.1206 of the Commission's rules, a copy of this notice is being electronically filed in the above-captioned dockets. Do not hesitate to contact me with any questions regarding this matter.

Very truly yours,

Michael B. Galvin General Counsel

cc: Tom Wheeler, Chairman

Jon Sallet, General Counsel

Daniel Alvarez, Wireline Legal Advisor